

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.
TO WITNESS JOHN T. PICKETT (MPA/USPS-T17-1)
(OCTOBER 19, 2001)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal
Rate Commission, Magazine Publishers of America, Inc. (MPA) directs the
following interrogatories to witness John T. Pickett

Respectfully submitted,


James Pierce Myers

Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

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MPA/USPS-T17-1. Please refer to USPS-LR-J-43 and to Docket No. R2000-1, USPS-LR-I-60, which both calculate Base Year distance-related transportation costs.

(a) Please confirm that Base Year 2000 Amtrak costs for Periodicals are comprised of \$78.931 million of railroad passenger costs and \$1.800 million in roadrailer costs. If you do not confirm, please explain.

(b) Please confirm that Docket No. R2000-1, Base Year 1998 Amtrak costs for Periodicals were \$59.283 million. If you do not confirm, please explain fully.

(c) Please explain generally why Amtrak costs for Periodicals increased over 36 percent from \$59.283 million in Base Year 1998 to \$80.731 million (\$78.931 plus \$1.800 million) in Base Year 2000 and also answer the following specific questions regarding the apparent change in the Postal Service's use of Amtrak to transport Periodicals.

(i) By what percentage did Amtrak unit costs increase between FY 1998 and FY 2000?


(ii) What proportion of Periodicals mail was transported on Amtrak in FY 1998?

(iii) What proportion of Periodicals mail was transported on Amtrak in FY 2000?

(iv) Did the Postal Service make a policy decision to increase its use of Amtrak for Periodicals between FY 1998 and FY 2000? If so, please explain fully why the Postal Service made this decision. If not, please explain the difference between your responses to part (c)(ii) and (c)(iii) of this interrogatory.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.



James Pierce Myers
Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

October 19, 2001
Alexandria, VA